



September 15, 2025

Hon. Gary R. Brown
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Jacob Israel Walden, No. 2:24-cr-00001 (GRB)

Dear Judge Brown:

I am writing on behalf of defendant Jacob Walden to respectfully request permission to file an oversized brief with respect to our forthcoming post hearing brief to suppress the search and seizure of Mr. Walden's cellphone in April 2024 as he departed the United States. I anticipate that we will require approximately 36 pages for our brief, as the search and seizure of a defendant's cellphone as he departs the United States remains a novel area of law. The government, by AUSA Leonid Sandlar, has no objection to this request and the defense consents should the Government require to file an oversized brief as well.

Thank you for the Court's consideration of this application.

Respectfully Submitted,

Saul Bienenfeld

Saul Bienenfeld

cc: AUSA Sandler via ECF